

ORIGINAL

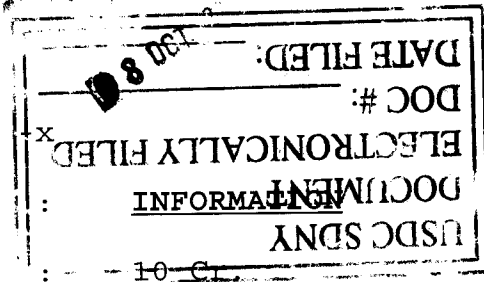
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

ZUBAIR TAHIR,

Defendant.



10 CRIM 923

COUNT ONE

The United States Attorney charges:

1. From at least in or about December 2006 up to and including in or about February 2008, in the Southern District of New York and elsewhere, ZUBAIR TAHIR, the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Section 1343 of Title 18, United States Code.

2. It was a part and an object of the conspiracy that ZUBAIR TAHIR, the defendant, and others known and unknown, unlawfully, willfully, and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire and radio communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing

such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

OVERT ACT

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about January 31, 2008, shortly after a straw buyer ("SB-1") purchased a property located at 60 Webster Avenue, Unit 201, Jersey City, New Jersey from ZUBAIR TAHIR, the defendant, TAHIR arranged for SB-1 to receive approximately \$20,000 in cash in New Jersey.

(Title 18, United States Code, Section 1349.)

FORFEITURE ALLEGATION

4. As a result of committing the offense alleged in Count One of this Information, ZUBAIR TAHIR, the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 982, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in this Information.

Substitute Asset Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of ZUBAIR TAHIR, the

property, as a result of any act or omission of ZUBAIR TAHIR, the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value;
- or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982, to seek forfeiture of any other property of ZUBAIR TAHIR, the defendant, up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982.)


PREET BHARARA *MEB*
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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INFORMATION

10 Cr.

(Title 18, United States Code,
Section 1349.)

PREET BHARARA
United States Attorney.
